



21st Floor  
1251 Avenue of the Americas  
New York, NY 10020-1104

**Katherine M. Bolger**  
212-402-4068 tel  
212-489-8340 fax

katebolger@dwt.com

February 9, 2023

**VIA ECF**

The Honorable Sarah L. Cave  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 1670  
New York, NY 10007-1312

**Re: *Flynn et al v. Cable News Network, Inc.*, No. 1:21-cv-02587-GHW-SLC**

Dear Judge Cave:

We represent Defendant Cable News Network (“CNN”) in the above-referenced action. Pursuant to Federal Rule of Civil Procedure 5.2(e) and 26(c), and Your Honor’s individual practice rule 1.G, we respectfully request to file the redacted portions of our letter-motion under seal given that the exhibits quoted therein have been designed by Plaintiffs as either “Confidential” or “Highly Confidential” pursuant to the March 15, 2022 Confidentiality Stipulation and Protective Order (Dkt. 60) in this action. Defendant also requests to redact the Plaintiffs’—and their family members’—phone numbers.

We thank the Court for its consideration of this matter.

Respectfully Submitted,

Davis Wright Tremaine LLP

A handwritten signature in blue ink, appearing to read 'Katherine M. Bolger'.

Katherine M. Bolger